

**CORRECTION: PRL 354 Review**

Richard Muza to: qthan

04/18/2009 03:09 PM

Cc: "Arnold, Content P CIV NAVFAC SW", "Smits, Marc P CIV NAVFAC SW"

Quang

Below is an evaluation of the PRL 354 risk assessment from Gerry Hiatt as per your request of a few weeks back. Please note that I am also providing this information to the Navy RPMs with hopes of assisting in the resolution of this issue at the upcoming BCT Meeting for MCAS El Toro.

In summary, Gerry determined that the PRGs used for PAHs evaluation at PRL 354 were the older Region 9 levels from 2004. If the newer RSLs (which for PAHs incorporate Cal EPA toxicity data) were used, the risk from PAHs would increase slightly. In either case the risk falls within the EPA Superfund Program risk range of 10-6 to 10-4.

EPA had previously provided the Navy with Agency concurrence on the "no further action" recommendation for all Group VI PRLs, of which PRL 354 is included. Due to my departure from the Federal Facilities and Site Cleanup Branch, EPA management was briefed on all on-going issues at MCAS El Toro late last week. At that time this PRL issue was addressed. The decision was made that if the risk from the two soils samples in question falls within the risk management range, then EPA would stand behind its previous decision of recommending no further action under Superfund at this PRL (ie., based on the data set provided, EPA does believe that a Superfund cleanup is not warranted at PRL 354). Therefore, PRL 354 is a closed issue for EPA.

THANKS!

Rich

Rich Muza  
Remedial Project Manager  
U.S. EPA Region 9, SFD-8-1  
75 Hawthorne Street  
San Francisco, CA 94105  
415-972-3349

----- Forwarded by Richard Muza/R9/USEPA/US on 04/13/2009 12:59 PM -----

From: Gerald Hiatt/R9/USEPA/US  
To: Richard Muza/R9/USEPA/US@EPA  
Date: 04/13/2009 12:41 PM  
Subject: MCAS El Toro PRL 354 - PAH Levels

Rich, Per your request, I have reviewed the report titled Summary Report for PRL [Potential Release Location] 354, Site Inspection, Former Marine Corps Air Station El Toro, California (October 2008). The report addresses polycyclic aromatic hydrocarbon (PAH) levels in surface soils at PRL 354, the former skeet range at the MCAS El Toro facility.

**PAHs and Potential Risks:** The report concludes that PAHs in surface soil potentially pose an excess lifetime cancer risk (ELCR) for a future resident at the property of approximately  $2 \times 10^{-5}$  (20 in one-million). As you noted in our discussions, this risk is well within the Superfund acceptable risk range of 10-6 (1 in one-million) to 10-4 (100 in one-million).

The Navy's consultant, Earth Tech, relied on the 2004 Region 9 PRGs (Preliminary Remediation Goals) for the risk calculations in this report. Just previous to the report, these PRGs were revised into the RSLs

(Regional Screening Levels) which all U.S. EPA Regions are now using for risk screening at Superfund sites. This is important because use of the RSLs would have produced a higher ELCR estimate for PAHs at PRL 354, approximately  $8 \times 10^{-5}$  (80 in one-million). This ELCR, while higher, is also within the Superfund acceptable risk range of  $10^{-6}$  to  $10^{-4}$ .

The reason for the higher risk estimate is that the 'new' RSLs incorporate Cal/EPA toxicity values for the PAHs, whereas the 'old' PAH PRGs were based on U.S. EPA toxicity values. Since Cal/EPA toxicity values are higher, the estimated risk using them is higher.

It is worth noting that this conclusion about risk is driven primarily by surface soil (0 to 1 foot below ground surface) samples from only 2 locations on the original site range. These 2 sampling locations, HA1 and HA2, are located approximately 320 feet from each other and thus represent a relatively small area of contamination. PAH levels at two other sample locations close by, HA9 and HA10, were significantly lower.

It would have been appropriate for Earth Tech to use the RSLs in this report, given the timing of the report. However at the time of this report there were technical problems with the RSL website which may explain use of the 'old' PRGs.

FYI, the report also addresses lead in surface soils at PRL 354 - I did not review or comment on the report's conclusions regarding lead.

Gerald F.S. Hiatt, Ph.D.  
Senior Regional Toxicologist  
U.S. EPA, Region 9  
(415) 972-3064  
Fax: 947-3520  
hiatt.gerald@epa.gov